

## **REMARKS**

### **Summary of the Office Action**

Claims 1-7 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,102,709 to *Howard et al.* in view of U.S. Patent No. 6,784,679 to *Sweet et al.*

Claim 8 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Howard et al.* in view of *Sweet et al.* in further view of U.S. Patent No. 6,037,787 to *Corwith*.

### **Summary of the Response to the Office Action**

Applicants respectfully traverse all rejections under 35 U.S.C. § 103(a).

### **All Claims Recite Allowable Subject Matter**

Claims 1-7 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Howard et al.* in view of *Sweet et al.* Claim 8 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Howard et al.* in view of *Sweet et al.* in further view of *Corwith*. Applicants respectfully traverse all rejections for at least the following reasons.

The Office has not established a *prima facie* case of obviousness at least because there is no suggestion or motivation to combine *Howard et al.* and *Sweet et al.* To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine reference teachings. MPEP §§ 2142-2143.

While the Office acknowledges that *Howard et al.* “fails to disclose a conductive pipe and an outer periphery of a part of the pipe [that] directly opposes an interior part wall of the through hole while forming an air gap there between,” the Office alleges that it would have been

obvious to one of ordinary skill in the art, at the time the invention was made, to modify *Howard et al.* with the teachings of *Sweet et al.* “for the purpose of having electrical isolation.”

Paragraph 4. Applicants respectfully disagree.

The gap 214 of *Sweet et al.* “is maintained between the central body 216 and the conductive tube 218 to provide electrical isolation.” Col. 3, lines 10-12. As the wire bundles 76 and 86 of *Howard et al.* are disposed within body member 70 and bottom body 80, both of which are formed from a dielectric material such as Teflon, one of ordinary skill would not have been motivated to combine the teachings of *Howard et al.* and *Sweet et al.* to provide “electrical isolation.” Col. 31-35 and 66-67.

As such, the suggestion or motivation to combine is not provided by either the references themselves or by knowledge generally available to one of ordinary skill in the art. Thus, the rejection of claim 1 should be withdrawn. Furthermore, claims 2-8 depend from independent claim 1. *Corwith* does not cure the deficiencies of *Howard et al.* and *Sweet et al.* Accordingly, dependent claims 2-8 are also allowable for at least the reasons stated above.

Moreover, it is recited in claim 1 that a part of the pipe directly opposes an interior wall of the through hole while forming an air gap therebetween. In the case where the contact probe (86, 90, 76) of *Howard et al.* is replaced by the contact probe (124, 122, 216) of *Sweet et al.* as alleged by the Office Action, it is not possible to form the air gap between the pipe of *Sweet et al.* (i.e., the central body 216) and the interior wall of the through hole of *Howard et al.* This is because the body members 70 and the bottom body 80 are disposed in the through hole of *Howard et al.* In order to form the air gap in such a combination, it is necessary to remove the bottom body 80 from the structure of *Howard et al.* However, as explained at col. 2, line 66 to

col. 3, line 10 of *Howard et al.*, the bottom body 80 is provided for housing the solid pin 90 and the wire bundle 86. Therefore, one of ordinary skill in the art is unlikely to remove the bottom body 80 of *Howard et al.* in order to provide electrical isolation.

### **CONCLUSION**

In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this paper, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

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Respectfully submitted,

**MORGAN LEWIS & BOCKIUS LLP**

By:

*for* Mary Jane Boswell

Reg. No. 33,652

*Robert S. Goodell*  
*Reg. No. 41,040*

**CUSTOMER NO. 009629**

**MORGAN, LEWIS & BOCKIUS LLP**

1111 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Tel: 202-739-3000

Fax: 202-739-3100